

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF PUERTO RICO

IN RE:

GANADERÍA DON JUAN SANTIAGO NIEVES, INC.

DEBTOR

CASE No. 10-07079 MCF

CHAPTER 12

**JOINT MOTION IN COMPLIANCE WITH  
ORDER**

NOW COME creditors Ada R.T. Pérez Valdivieso, Banco de Desarrollo Económico para Puerto Rico or Economic Development Bank (“EDB”) and Centro de Recaudación de Ingresos Municipales (“CRIM”) through the undersigned attorneys and respectfully allege and pray:

1. On April 13, 2011 the parties were ordered to show cause as to why they should not be sanctioned for failing to timely file a Joint Pre-Trial Report and Memorandum of Law for the pretrial conference in the instant case scheduled for April 14, 2011. Said filings were due on April 1<sup>st</sup>. 2011. Docket # 48.

2. On April 1<sup>st</sup>. 2011 the appearing parties filed a joint motion advising the Court that the Debtor had made no attempt to meet with them to prepare the joint report. The fact is that Debtor’s attorney never returned our calls and e-mail to arrange a meeting for the preparation of the report and memorandum. Nevertheless, in compliance with the undersigned’s

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duty to the Court, a draft of Creditors' part of the proposed pretrial report and order was attached to the motion and filed on the April 1<sup>st</sup> 2011 deadline. Docket # 47.

3. On April 13, 2011, one day before the pre-trial conference, Debtor's attorney filed a motion resigning legal representation. Docket # 49. On May 4, 2011 the Court granted the motion and, seemingly, released Debtor's attorney from complying with the April 14, 2011 order to show cause. Docket # 52.

4. In view of the foregoing, and for the reasons set forth in the undersigned's April 1<sup>st</sup> 2011 joint motion (Docket # 47), it is clear that the undersigned did everything in their power to comply with the deadline to file the Joint Pre-Trial Report and that they should not be sanctioned.

WHEREFORE, it is respectfully requested that the undersigned not be sanctioned.

#### **CERTIFICATE OF SERVICE**

**WE HEREBY CERTIFY** that on this day it was electronically filed the foregoing *Joint Motion in Compliance with Order* with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

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**WE FURTHER CERTIFY** that copy of this document was served by mail through the United States Postal Service to the following non CM/ECF participants:

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In San Juan, Puerto Rico, this 10<sup>th</sup> day of May 2011

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